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Attorneys for Defendants Liberty Mutual
Insurance Company. (aka LM General Insurance
Company; aka Safeco Insurance Company)

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

EVELYN CONERLY, an individual,

Plaintiff,

v.

LIBERTY MUTUAL INSURANCE
COMPANY, (AKA LM GENERAL
INSURANCE COMPANY; AKA SAFECO
INSURANCE COMPANY); DOES I through
X, and ROE CORPORATION I through X,
inclusive,

Defendants.

Case No. 2:23-cv-00515-GMN-EJY

**STIPULATION TO EXTEND DEADLINE
FOR LIBERTY MUTUAL TO FILE ITS
REPLY IN SUPPORT OF ITS MOTION
TO DISMISS**

(First Request)

Plaintiff, EVELYN CONERLY (“Plaintiff”) and Defendant, LIBERTY MUTUAL INSURANCE COMPANY (“Liberty Mutual”) (collectively, “Parties”), by and through their respective counsel, hereby stipulate to extend the deadline for Liberty Mutual to File its Reply in Support of its Motion to Dismiss, filed on April 14, 2023 (ECF No. 6). This is the first stipulation for extension of time to file a reply in support of this pending motion.

On June 8, 2023, Plaintiff filed her Response to Liberty Mutual’s Motion to Dismiss. (ECF

No. 18). Liberty Mutual's Reply in Support of its Motion to Dismiss is currently due on June 15, 2023. The Parties agree to extend the deadline for Liberty Mutual to file its Reply by one week, to **June 22, 2023**. Liberty Mutual requests this extension because additional time is needed to respond to Plaintiff's alternative Motion for Leave to File Amended Complaint that was submitted simultaneously with Plaintiff's Opposition to Defendant's Motion to Dismiss. This request is made in good faith, and not for the purpose of undue delay.

Dated: June 13_, 2023

THEONELAWYER.COM

By: /s/ Laura Payne

Laura Payne

Nevada Bar No. 4718

2831 St. Rose Parkway, Ste. 200

Henderson, NV 89052

Attorney for Plaintiff Evenlyn Conerly

Dated: June 13, 2023

McCORMICK, BARSTOW, SHEPPARD,
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By: /s/ Chenelle L. Jackson

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Attorneys for Defendants Liberty Mutual Insurance
Company. (aka LM General Insurance Company; aka
Safeco Insurance Company)

IT IS SO ORDERED.

Dated: June 15, 2023



CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of June, 2023, a true and correct copy of **STIPULATION TO EXTEND DEADLINE FOR LIBERTY MUTUAL TO FILE ITS REPLY IN SUPPORT OF ITS MOTION TO DISMISS** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

By /s/ Susan Kingsbury
an Employee of
McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

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